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August 24, 2021

Via ECF

Honorable Leda Dunn Wettre, U.S.M.J
United States District Court
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Deborah Gross-Quatrone v. Bonnie Mizdol, et al.
Docket No.: 2:17-cv-13111-SDW-LDW

Dear Judge Wettre:

We represent Defendants in this matter. We write to the Court in brief response to Mr. Dwyer's letter of August 23, 2021.

First, as to the depositions, Your Honor has held that Plaintiff's deposition is to go first. Defendants do not wish to wait until October to depose Plaintiff and have noticed her deposition for September 9, 2021. Defendants will provide availability for the three named defendants and Judge Grant thereafter.

Second, Defendants have determined that we will not be filing a motion seeking to claw back the documents in this matter. However, Defendants maintain our position that the documents inadvertently disclosed by Dr. Ghilain are not relevant to this action.

We thank Your Honor for your continued courtesies in addressing these matters.

Respectfully submitted,
BROWN & CONNERY, LLP

s/ Kathleen E. Dohn
Kathleen E. Dohn

cc: Ralph Ferrara, Esquire (*via ECF and Electronic Mail*)
Kevin Koch, Esquire (*via ECF and Electronic Mail*)
Andrew Dwyer, Esquire (*via ECF and Electronic Mail*)
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